

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

NEIL HESLIN,
Plaintiff,

v.

ALEX E. JONES, INFOWARS, LLC, FREE
SPEECH SYSTEMS, LLC,

Defendants.

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) ADV. PROC. NO. 22 - _____
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NOTICE OF REMOVAL

Defendant InfoW, LLC (f/k/a Infowars, LLC), pursuant to 28 U.S.C. §§ 1334 and 1452, Federal Rule of Bankruptcy Procedure 9027, and Local Rule of Bankruptcy Procedure 9027(b)(1), hereby files this Notice of Removal of Cause No. D-1-GN-18-001835, from the 261st District Court of Travis County, Texas (the “State Court”), where this action was commenced, to this Court. As grounds for such removal, InfoW, LLC states as follows:

1. On April 16, 2018, Plaintiff Neil Heslin filed his original petition in the State Court, thus initiating the “State Court Lawsuit.” The State Court Lawsuit names InfoW, LLC as a defendant.

2. On April 18, 2022 (the “Petition Date”), InfoW, LLC filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of Texas, Victoria Division, pending as Case No. 22–60020 (the “Bankruptcy Case”).

3. InfoW, LLC timely files this Notice of Removal within 90 days of the Petition Date pursuant to Federal Rule of Bankruptcy Procedure 9027(a)(2).

4. The United States District Court for the Western District of Texas has original jurisdiction over this action pursuant to 28 U.S.C. §1334(b) as the State Court Lawsuit is “related to” the Bankruptcy Case. Additionally, there the diversity jurisdiction under 28 U.S. Code § 1332.

5. Removal to this Bankruptcy Court is proper pursuant to 28 U.S.C. § 1452, Federal Rule of Bankruptcy Procedure 9027, and the Order of Reference of Bankruptcy Cases and Proceedings of the U.S. District Court for the Western District of Texas (the “Order of Reference”). The State Court Lawsuit was filed in Travis County, Texas. The U.S. District Court for the Western District of Texas, Austin Division, is the United States district and division embracing that county. The Order of Reference provides that “[a]ll bankruptcy cases and proceedings filed under Title 11 of the United States Code, or arising from or related to any case or proceeding filed under Title 11, shall be automatically referred to the bankruptcy judges of this district” subject to exceptions that do not apply here.

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Dated: April 18, 2022

PARKINS LEE & RUBIO LLP

/s/ R. J. Shannon

Kyung S. Lee

TX Bar No. 12128400

R.J. Shannon

TX Bar No. 24108062

Pennzoil Place

700 Milam Street, Suite 1300

Houston, TX 77002

Email: klee@parkinslee.com

rshannon@parkinslee.com

Phone: 713-715-1660

Fax: 713-715-1699

*Proposed Counsel to the Debtors and
Debtors-in-Possession*

CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2022, a true and correct copy of the foregoing document was served by U.S.P.S. and, where indicated, email on the following parties:

Attn: Mark Bankson, William Ogden
Farrar & Ball, LLP
1117 Herkimer Street
Houston, TX 77008
mark@fbtrial.com
bill@fbtrial.com

Attn: F. Andino Reynal
Fertitta & Reynal LLP
917 Franklin St., Suite 600
Houston, TX 77002
areynal@frlaw.us

Jordan & Ortiz, P.C.
500 N. Shoreline Blvd. Suite 900
Corpus Christi, Texas 78401
sjordan@jhwclaw.com

Attn: Ray Bataglia
Law Office of Ray Battaglia, PLLC
66 Granburg Circle
San Antonio, TX
rbattagliaw@outlook.com

/s/ R. J. Shannon

R. J. Shannon